

Evan Frank

From: Evan Frank
Sent: Monday, November 28, 2022 3:23 PM
To: Trevor C. Serine, Esq.
Subject: RE: Deposition 11-18-22

Reaching out again regarding below. We are still willing to have Mr. Hirsch come to PA for a deposition. If that is what you want then please give me some dates when you are available. If you want to depose Mr. Bonner on zoom or near his place of business, you can also do so.

From: Evan Frank
Sent: Thursday, November 17, 2022 10:58 AM
To: Trevor C. Serine, Esq. <TCS@Serinelaw.com>
Subject: RE: Deposition 11-18-22

My answer is the same as before: If you want Mr. Hirsch the day before Thanksgiving, then you have to do it on zoom. If you want him in person in PA, then you have to do it on a different day. However, we're not bringing Mr. Bonner to PA.

From: Trevor C. Serine, Esq. <TCS@Serinelaw.com>
Sent: Thursday, November 17, 2022 8:33 AM
To: Evan Frank <EFrank@alflaw.net>
Subject: Deposition 11-18-22

Good morning Evan:

Kindly confirm the attendance of your client at the deposition scheduled for 11/18/22 by 11:00 am today or the deposition will be canceled for non-compliance and to avoid the no-show/cancellation fee from the reporter.

Thanks,

Trevor C. Serine, Esq.
Serine Law
30 West Third Street
Media, PA 19063
Direct (Office): 4844486426
Mobile/Signal: 4842694088
Fax: 6108927412
Serinelaw.com

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Evan Frank

From: Trevor C. Serine, Esq. <TCS@Serinelaw.com>
Sent: Tuesday, November 15, 2022 2:33 PM
To: Evan Frank
Subject: Re: Depositions
Attachments: 3rd Notice of Dep - Hirsch.pdf; 3rd Notice of Dep - Bonner.pdf

Evan:

See attached Notices of Deps for Mr. Bonner on the 18th, and Mr. Hirsch on the 23rd. A Court reporter is scheduled for the 18th and reserved for the 23rd. This is a change than what we were discussing yesterday, but it is within your suggested dates.

We want to take the deposition of Mr. Bonner prior to deposing Mr. Hirsch, in the event that there is information obtained from Mr. Bonner that is relevant to Mr. Hirsch's dep.

Thanks,

On 11/14/2022 9:35 PM, Trevor C. Serine, Esq. wrote:

Ok - left a message with the court reporting service. Assuming they are available (I should know by tomorrow morning but I don't have any reason to think they aren't), we can go forward with the 18th with Mr. Hirsch.

Thanks

On 11/14/2022 9:21 PM, Evan Frank wrote:

The 18th is good for Mr. Hirsch. Please confirm ASAP so he can book a ticket.

From: Trevor C. Serine, Esq. <TCS@Serinelaw.com>
Sent: Monday, November 14, 2022 3:55 PM
To: Evan Frank <EFrank@alflaw.net>
Subject: Re: Depositions

I am only available on the 18th and on the 23rd.

Thanks

On 11/9/2022 3:04 AM, Evan Frank wrote:

We're not available the days you noticed for the depositions of Mr. Hirsch and Mr. Bonner. However, we would like to schedule them either next week (Nov. 14-18) or the three days before Thanksgiving (Nov. 21-23). Can you please let me know when you are available in those two weeks, and then I will confirm with the witnesses and get these scheduled.

Additionally, you can depose Mr. Hirsch in PA. However, Mr. Bonner is not an officer or director of the company and therefore cannot be required to travel for his deposition.

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